IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

PENNSYLVANIA EMPLOYEES BENEFIT TRUST FUND, on behalf of itself and all others similarly situated.

Plaintiff,

: Civil Action No. 1:05-cv-75 (SLR) VS.

ZENECA, INC.; and ASTRAZENECA PHARMACEUTICALS, L.P.,

Defendants.

LINDA A. WATTERS, Commissioner, Offices of Financial and Insurance Services for the State of Michigan: in her capacity as Rehabilitator of The Wellness Plan and : in her capacity as Liquidator of Michigan Health Maintenance Organization Plans, Inc., formerly known as: OmniCare Health Plan, Inc., individually and on behalf of: Civil Action No. 1:05-cv-196 (SLR)

Plaintiff,

VS.

all others similarly situated

ASTRAZENECA PHARMACEUTICALS, LP, and ZENECA, INC.,

Defendants.

(additional case caption appears on next page)

PLAINTIFFS' UNOPPOSED MOTION IN SUPPORT OF ENTRY OF [PROPOSED] PRETRIAL ORDER NO. 1

JOSEPH MACKEN, on behalf of himself and all others similarly situated,

Plaintiff,

VS.

Civil Action No. 1:05-cv-220 (SLR)

ASTRAZENECA PHARMACEUTICALS LP; AND ZENECA, INC.,

Defendants.

Plaintiffs in the above-captioned actions hereby move this Court for entry of the attached [Proposed] Pretrial Order No. 1 ("PTO No. 1"). Defendants have agreed to the form and content of PTO No. 1, and have been provided with a copy of this motion. Plaintiffs have been authorized to represent that Defendants do not oppose this motion or the entry of PTO No. 1.

Concurrently with this motion, Plaintiffs are filing a notice withdrawing their April 22, 2005 motion for entry of an earlier iteration of PTO No. 1 (the "Withdrawn Motion"). The Withdrawn Motion includes as exhibits the resumes of the firms to be appointed, per the attached PTO No. 1, as interim co-lead, liaison and allocation counsel on behalf of Plaintiffs and the putative class they seek to represent. Rather than burden the Court with additional identical copies of those documents. Plaintiffs respectfully refer the Court to Exhibits 2 through 7 of their brief in support of the Withdrawn Motion as support for the entry of PTO No. 1.

Dated: May 5, 2005.

Barbara Hart Christopher McDonald GOODKIND LABATON RUDOFF & SUCHAROW 100 Park Avenue New York, New York 10017 Proposed Interim Co-Lead Counsel Respectfully submitted,

Pamela S. Tikellis (D.S.B.A. No. 2172) Robert J. Kriner, Jr. (D.S.B.A. No. 2546) A. Zachary Naylor (D.S.B.A.No. 4439) Robert R. Davis (D.S.B.A. No. 4536) CHIMICLES & TIKELLIS LLP

One Rodney Square
P.O. Box 1035
Wilmington, Delaware 19899
Proposed Interim Liaison Counsel

Steve W. Berman
HAGENS BERMAN SOBOL
SHAPIRO LLP
1301 Fifth Avenue, Suite 2900
Seattle WA 98101
-andThomas M. Sobol
HAGENS BERMAN SOBOL
SHAPIRO LLP
One Main Street, 4th Floor
Cambridge, MA 02142
Proposed Interim Co-Lead Counsel

Jeffrey L. Kodroff
Theodore M. Lieverman
SPECTOR, ROSEMAN & KODROFF, P.C.
1818 Market Street, Suite 2500
Philadelphia, Pennsylvania 19103
Proposed Interim Co-Lead Counsel

Page 3 of 4

Of Counsel:

Ronald S. Goldser ZIMMERMAN REED, PLLP 651 Nicollet Mall, Suite 501 Minneapolis, MN 55402 (612) 341-0400

Jason J. Thompson CHARFOOS & CHRISTENSEN, P.C. 5510 Woodward Avenue Detroit, MI 48202

James R. Malone, Jr.
Michael D. Gottsch
Daniel B. Scott
Timothy N. Mathews
CHIMICLES & TIKELLIS LLP
361 West Lancaster Avenue
Haverford, PA 19041

Ellen Meriwether
Bryan L. Clobes
MILLER FAUCHER and CAFFERTY LLP
One Logan Square
18th & Cherry Streets, Suite 1700
Philadelphia, Pennsylvania 19103

L. Kendall Satterfield Richard M. Volin FINKELSTEIN, THOMPSON & LOUGHRAN 1050 30th Street, N.W. Washington, D.C. 20007

Robert S. Schachter
Joseph Lipofsky
Paul Kleidman
ZWERLING, SCHACHTER
& ZWERLING, LLP
41 Madison Avenue
32nd Floor
New York, NY 10010

Jeffrey S. Goddess ROSENTHAL MONHAIT GROSS & GODDESS, P.A. 919 Market Street, Suite 1401 Wilmington, DE 19801

Richard Kirschner KIRSCHNER & GARTRELL 4910 Massachusetts Ave., NW Suite 215 Washington, D.C. 20016